

AO 91 (Rev. 11/11) Criminal Complaint

FILED
At Albuquerque NM

SEP 24 2018

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Shawn P. Williams (year of birth 1970, SSN
XXX-XX-5536)

Case No. 18-mj-3098

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21, 2018 in the county of Bernalillo in the
District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18 USC § 2113

Attempted Bank Robbery

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Daniel Fondse, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/24/2018

Judge's signature

City and state: Albuquerque, NM

Laura Fashing, U.S. Magistrate Judge

Printed name and title

KAREN B. MOLZEN
U.S. MAGISTRATE JUDGE

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT; SHAWN WILLIAMS

I, Daniel Fondse, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND OF THE AFFIANT

1. I make this affidavit in support of the arrest of Shawn Williams (year of birth 1970, SSN XXX-XX-5536), for violation of 18 United States Code (USC) Section (§) 2113, which prohibits, by means of force and violence, or intimidation, the taking, or attempted taking, from the person or presence of another, or obtaining or attempting to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association.
2. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been so employed since May 2017. I am therefore authorized to investigate federal criminal offenses. I am currently a member of the Violent Crimes Squad of the Albuquerque Division of the FBI. I have received on the job training from other experienced agents and detectives in the investigations of violent crimes. Prior to joining the FBI, I spent three years as a sworn law enforcement officer of the San Diego Police Department. My investigative training and experience includes, but is not limited to, conducting surveillance, interviewing subjects, victims, and witnesses, writing affidavits for and executing search and arrest warrants, managing cooperating sources, issuing subpoenas, collecting evidence, and analyzing public records. The information set forth in this affidavit has been derived from my own investigations or communicated to me by other sworn law enforcement officers or from other reliable sources.

FACTS AND CIRCUMSTANCES ESTABLISHING PROBABLE CAUSE

3. In September, 2018 a tipster, whose identity is known to the FBI, contacted the Albuquerque Division of the FBI to provide information about a planned bank robbery. The tipster provided information that the resident of 1700 Spencer Ave SE, Albuquerque, NM, later identified as Shawn Williams, was planning a bank robbery. Williams planned to use a black Nissan Versa to get to the bank.

Williams planned to change the license plate on the vehicle before he arrived at the bank and to leave his cellular phone at home to avoid apprehension.

4. Law enforcement officers began surveillance on 1700 Spencer Ave SE, Albuquerque, NM. They observed a black Nissan Versa stop at that location. Shortly thereafter, the Nissan Versa departed with Williams driving. Law enforcement officers began surveillance and later observed Williams park directly in front of the branch of US Bank located at 1418 Carlisle Blvd NE, Albuquerque, NM. Williams exited the vehicle and approached the bank holding a white piece of paper. He was detained by law enforcement a short distance from the main door of the bank.

5. The license plate had been removed from the Nissan Versa. Williams was also in possession of a note which read "I HAVE A GUN GIVE ME ALL THE MONEY IN THE DRAWER NO DIE PACKS OR TRACERS".

6. During an interview, Williams said he needed some money. He was thinking of going into the bank and handing them the note. He wrote the note a month ago. He does not have an account with US Bank. He chose this location because it was close to his house and it was easier to get out of the area. He chose today because he got enough nerve to try to do it, but he probably would have decided not to when he got to the door because it's not something he'd do. Williams said he left his cell phone at home because it was charging.

7. US Bank is insured by the Federal Deposit Insurance Corporation (FDIC), wherefore it is a bank as defined under 18 USC § 2113.

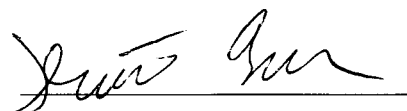
CONCLUSION

8. Based on the above information, I believe there is probable cause to believe Shawn Williams committed an attempted bank robbery on September 21, 2018 in violation of 18 USC § 2113. Therefore, I submit this affidavit as it supports probable cause for the arrest of Shawn Williams.

9. This affidavit has been reviewed by Supervisory Assistant United States Attorney Jack Burkhead.

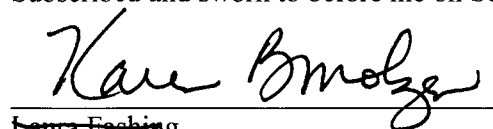
SHAWN WILLIAMS AFFIDAVIT
As of CBM

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Daniel Fondse
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on September 24, 2018:



~~Laura Fashing~~
United States Magistrate Judge

KAREN B. MOLZEN
U.S. MAGISTRATE JUDGE